

APPENDIX A

Deadline	Current Date	Plaintiffs' Proposal
Requests for Admission (except for requests to establish authenticity or admissibility of documents)	August 21, 2025	November 21, 2025
Fact Discovery Deadline	November 21, 2025	February 27, 2026
Opening expert reports	February 19, 2026	May 20, 2026
Rebuttal expert reports	April 20, 2026	July 20, 2026
Reply expert reports	June 4, 2026	September 1, 2026
Class cert motion Daubert motions for opening expert reports	July 20, 2026	September 29, 2026
Opposition to class cert motion Daubert motions for rebuttal expert reports Oppositions to Daubert motions for opening expert reports	September 7, 2026	November 13, 2026
Reply ISO motion for class cert Oppositions to Dauberts for rebuttal reports Replies ISO Dauberts for opening reports	October 7, 2026	December 14, 2026
Replies ISO Daubert motions for rebuttal reports	November 6, 2026	January 13, 2027
Class certification and Daubert hearing	November or December 2026	January 2027
Summary judgment motions	March 1, 2027	April 27, 2027
Oppositions to summary judgment motions	April 30, 2027	June 11, 2027
Replies ISO summary judgment	June 14, 2027	July 26, 2027
Argument on SJ motions	July 15 and 16, 2027	August 2027, at Court's convenience
Trial-ready	October 1, 2027	January 3, 2028
Pretrial materials due for M.D. Tenn. cases	January 10, 2028	January 10, 2028
Pretrial conference for M.D. Tenn. cases	January 18 and 19, 2028	January 18 and 19, 2028
Jury trial for M.D. Tenn. cases	February 1, 2028	February 1, 2028